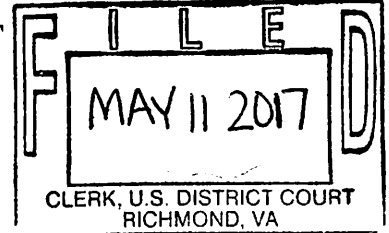


AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia



United States of America

v.

ANTONIO LAMONT JONES JR.

Case No.

3:17mj91

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 08/10/2016 in the county of Chesterfield in the
Eastern District of Virginia, the defendant(s) violated:

Code Section

Offense Description

Title 18 USC 1951(a)

Interference with commerce by threats or violence of the 7-Eleven business
at 10121 Chester Road, Chester, VA 23831

Title 18 USC § 924(c)

Use of a Firearm in a Crime of Violence 10121 Chester Road, Chester, VA
23831

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

Complainant's signature

Joshua P. Hylton, Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date:

May 11, 2017

IS/
David J. Novak

United States Magistrate Judge

City and state:

Richmond, Virginia

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

Your affiant, Joshua Hylton, being duly sworn, herby states:

1. Your affiant is a law enforcement officer within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. I, the undersigned, have over five years of law enforcement experience stemming from employment as a police officer with the Chesterfield County Police Department. Currently, I am a duly appointed Task Force Officer with the Federal Bureau of Investigation (FBI) and have been so since December 2016. I am assigned to the Richmond FBI's Central Virginia Violent Crimes Task Force where my duties include investigating bank robberies, extraterritorial offenses, armored car robberies, kidnappings, armed carjackings, and theft of government property. I have investigated numerous criminal violations and have obtained arrest and search warrants that have culminated in the successful prosecutions of their respective offenders. The crimes I investigate are violent in nature and usually involve two or more individuals. I am familiar with the methods violent offenders use to conduct their illegal activities, to include, but not limited to their communication methods, use of additional co-conspirators, and reoccurring method of operation (MO).

2. I am familiar with the facts and circumstances of this investigation through my personal participation, discussions with agents of the FBI and other law enforcement agencies, my review of records and reports relating to this investigation, and discussions with involved witnesses. Unless otherwise noted, wherever in this affidavit, I assert that a statement was made, the information was provided by another FBI agent, law enforcement officer, or witness who may

have had either direct or hearsay knowledge of that statement, and to whom I or others have spoken with, or whose reports I have read and reviewed. The facts in this affidavit came from my personal observations, my training and experience, and information obtained from other agents and witnesses.

3. I am aware that Title 18 of the United States Code, Section 1951 (a), makes it a crime for anyone to use force, violence, or intimidation to take the proceeds of businesses that participate in interstate commerce. In addition, I am aware that Title 18 of the United States Code, Section 924 (c), makes it a crime for anyone to use a firearm in a crime of violence.

4. Having so said, I make this affidavit in support of a criminal complaint charging:

- ANTONIO LAMONT JONES, DOB: 04/XX/1998, SSN: XXX-XX-5303, with one count of Hobbs Act robbery in violation of Title 18 U.S.C. § 1951(a), and one count of Use of a Firearm in a Crime of Violence in violation of Title 18 U.S.C. § 924(c).
- DERRICK ORLANDO RAMSEY, DOB: 09/XX/1989, SSN: XXX-XX-8749, with one count of Hobbs Act robbery in violation of Title 18 U.S.C. § 1951(a), and one count of Use of a Firearm in a Crime of Violence in violation of Title 18 U.S.C. § 924(c).

5. This affidavit is being submitted for the limited purpose to show merely that there is sufficient probable cause for the requested arrest warrants and does not set forth all of my knowledge about this investigation. I have set forth facts I believe are necessary to charge JONES and RAMSEY with the criminal conduct set forth herein.

FACTS

6. The United States through the FBI's Central Virginia Violent Crimes Task Force (CVVCTF) is conducting a criminal investigation involving a series of armed commercial robberies in violation of Title 18 U.S.C. 1951(a) and 18 U.S.C. § 924(c). On at least six separate occasions, masked/armed subjects have entered 24-hour convenience stores within the Eastern District of Virginia and robbed the businesses of United States currency and merchandise. Each of the businesses conduct interstate commerce with the goods they purchase and sell. As a result of the investigation, law enforcement has been able to identify two (2) subjects, DERRICK ORLANDO RAMSEY, and ANTONIO LAMONT JONES, as the perpetrators of the robberies set forth below.

7. On August 10, 2016 at approximately 12:55 a.m., JONES and RAMSEY entered the 7-Eleven located at 10121 Chester Road, Chesterfield, VA. Victim, T.S., was working as the store clerk and returning from taking trash to the outside dumpster when JONES and RAMSEY approached him while still outside. The perpetrator believed to be RAMSEY brandished a black and silver metallic semi-automatic handgun, and ordered T.S. into the business. The perpetrator believed to be RAMSEY stated "You know what it is give it up! Don't try and call the police, or do anything stupid." T.S. was then forced behind the counter, where he was ordered to open the cash registers. JONES and RAMSEY took approximately \$339.44 in United States currency belonging to the business. The perpetrator believed to be JONES brandished a black metallic semi-automatic handgun, and took tobacco products from the store's shelves after assisting the perpetrator believed to be RAMSEY with the U.S. currency from the registers. The perpetrator

believed to be JONES asked T.S. "Where da Newport's at?" T.S. told the perpetrator believed to be JONES the shipment had not yet arrived. The perpetrator believed to be JONES then placed the tobacco products into a bag he had brought with him and demanded T.S. to produce his cell phone. T.S. then gave the perpetrator believed to be JONES a Samsung Galaxy S4 with baby blue case. JONES and RAMSEY then fled the store on foot towards Centralia Road. A Richmond Police K-9 unit arrived on scene shortly after the robbery and tracked in the same direction JONES and RAMSEY fled. The K-9 handler reported that the track was lost shortly after, and through his training and experience this meant that the suspects used a vehicle to flee the area. T.S. described the perpetrator believed to be RAMSEY as a black male approximately 5'08", medium build, wearing dark colored pants, dark colored hooded sweatshirt with white lettering (Virginia Beach), white sneakers, gray gloves, olive colored book-bag, and gray bandanna covering his face. T.S. described the perpetrator believed to be JONES as a black male, approximately 5'08", thicker build, wearing dark colored pants, gray/black hooded sweatshirt, white/red tennis shoes, tan duffle bag, gray gloves, and a black bandanna covering his face.

8. On August 29, 2016, Chesterfield County Police officers responded to 6107 Moonlight Drive, Chesterfield, VA, in reference to a burglary. Victim, P.S., reported more than \$44,000.00 worth of miscellaneous jewelry, United States currency, assorted personal items, and a small safe containing important legal documents and identification papers were taken from their residence. P.S. stated that he was on vacation with family between May 27, 2016 and August 29, 2016, during which time unknown person(s) broke into his residence and took their belongings. During the course of the investigation, law enforcement found a Craigslist add/post where a subject known as "Jay" was attempting to sell four designer purses matching the description of like items

stolen from the above address. P.S. positively identified the purses through the pictures in the Craigslist add, and noted that the items were positioned on an exposed mattress which he recognized due to prior ownership (blue pillow top). P.S. gave the mattress to his neighbors who reside at 6101 Moonlight Drive, Chesterfield, VA. The Craigslist post contained the phone number (804) 573-3913 as a point of contact in reference to the sale of listed items. A search of electronic databases available to law enforcement found (804) 573-3913 to belong to JONES' sister M.J. (reported address of 6101 Moonlight Drive, Chesterfield, VA).

9. On September 2, 2016, Chesterfield County Police executed a search warrant on 6101 Moonlight Drive, Chesterfield, VA in reference to the above burglary. Law enforcement found ANTONIO JONES and others lived in the home. During the search, law enforcement located a LG cellular phone (804-573-3913) on JONES' bed, an Ithica 12 gauge pump action shotgun (SN: 934600 reported to be stolen out of Chesterfield, VA) under JONES' mattress, and a camouflage book bag. After asked, JONES advised that the cellular device belonged to him, and that he would consent to a search and download of the phone. JONES stated that he got the shotgun from a known party, but the firearm was jammed, and was stored under his mattress for safe keeping (regarding the children in the household). While conducting a search of the aforementioned book bag, law enforcement seized multiple 12 gauge ammunition/shotshells, a black metallic Umarex BB air pistol, a black handgun holster, 9mm Luger ammunition/cartridges, and latex gloves. The book-bag and latex gloves matched the descriptions of like items used by JONES and RAMSEY in the 7-Eleven robbery on August 10, 2016 (Chesterfield, VA).

10. On September 7, 2016, law enforcement agents downloaded the LG cellular

telephone seized from JONES. After review of said data, videos and images depicting drug use and sale, large quantities of Newport cigarettes, firearm possession and use, and stacks of U.S. currency were found on the device. In several pictures and videos, JONES is shown possessing and firing a black and silver metallic semi-automatic handgun matching the described weapon in the 7-Eleven robbery on August 10, 2016. Pictures, account names, and conversations identifying the device's primary user/owner as JONES were also found pursuant to the search. Law enforcement agents examined the cellular devices' Google Map application, internet searched items, web history, and cell tower data. Agents learned that 34 Google map inquiries/searches were conducted regarding 7-Eleven's in the areas of Petersburg, Chester, Richmond, Colonial Heights, North Chesterfield, Sandston, and Hopewell (Virginia). Many of the searched 7-Eleven's included in the list were victims of commercial robberies and subsequently included in this document.

11. Further review of the cellular devices' download yielded tower data, which shows the cell towers the device used at specific times. On June 29, 2016 at 11:21 p.m. the cellular devices was using the cell tower located at Lat: 37.454689 and Lon: -77.515030. This tower is a short distance from the 7-Eleven located at 5549 Belmont Road, Chesterfield, VA, which was robbed on this date at 12:40 a.m. On July 11, 2016 at 3:11 a.m. the cellular device used the cell tower located at Lat: 37.252510 and Lon: -77.387924. This tower is a short distance from the Sunoco located at 961 Temple Avenue, Colonial Heights, VA, which was robbed on July 11, 2016 at approximately 3:15 a.m. On August 10, 2016 at 12:50 a.m. the cellular device was using the cell tower located at Lat: 37.380649 and -77.451278. This tower is a short distance from the 7-Eleven located at 10121 Chester Road, Chesterfield, VA, which was robbed on August 10, 2016

at approximately 12:55 a.m. Agents further found that following the above mentioned robberies the cellular telephone's tower data/location promptly changes, which indicates that the device and user left the area after each robbery.

12. From November 2016 to March 2017 law enforcement agents have interviewed a source of information (SOI) regarding their knowledge pertaining to the robberies mentioned above. The SOI stated that she/he has known JONES for more than 2 years. During this time the SOI and JONES have spoken and "hung out" a significant number of times, and the SOI lived with JONES for a short period of time at 6101 Moonlight Drive, Chesterfield, VA. The SOI went on to say that DERRICK RAMSEY aka: DJ had been the second person who was with JONES during the above robberies (both driver and active participant). The SOI stated that RAMSEY has lived with JONES at his residence at 6101 Moonlight Drive, Chesterfield, VA, and RAMSEY has a child with JONES' sister, M.J.. The SOI told law enforcement that she/he has direct knowledge regarding several commercial robberies.

13. The SOI stated the first commercial robbery she/he knows about JONES and RAMSEY committing was the 7-Eleven located at 5549 Belmont Road, Chesterfield, VA on June 30, 2016. JONES and RAMSEY spent time planning the robbery and even borrowed M.J.'s lime-green Ford Fiesta to commit the crime. The SOI stated she/he was told by JONES and RAMSEY that RAMSEY drove them to the area of the 7-Eleven and waited near one of the entrances to the Belmont Hills apartment complex. During this time JONES robbed the 7-Eleven, and RAMSEY acted as a getaway driver after the robbery.

14. The SOI also stated that she/he had direct knowledge of two robberies which took place on the same night. The SOI did not know the date or addresses, however the SOI did know the business names and location. The SOI stated JONES and RAMSEY robbed the Sunoco located at 961 Temple Avenue, Colonial Heights, VA and the 7-Eleven located at 3301 Oaklawn Boulevard, Hopewell, VA on July 11, 2016. The SOI stated RAMESY was the driver in the two robberies. During the Sunoco robbery the SOI knew RAMSEY dropped off JONES under the overpass next to the Sunoco and parked near the McDonald's at Southpark Mall as JONES committed the robbery. The McDonald's is adjacent to Golden Corral where surveillance video captured a person believed to be JONES getting into the back seat of a vehicle after the robbery.

15. The SOI further stated she/he knew about the robbery which took place fairly close to JONES' residence. This was determined to be the robbery of the 7-Eleven located at 121 Turner Road, Chesterfield, VA on July 29, 2016. The SOI stated JONES used a BB gun and RAMSEY used a black and silver semi-automatic 9mm handgun in the robbery. The SOI stated the last commercial robbery she/he had knowledge of was a 7-Eleven located at 10121 Chester Road, Chesterfield, VA, which took place on August 10, 2016. The SOI was unable to recall specific details pertaining to the robbery itself; however, she/he advised having been with JONES days later, when JONES decided to throw his Nike Hi-top tennis shoes into a wooded area near his home to avoid suspicion regarding the robberies.

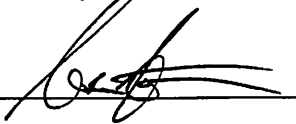
16. The SOI stated that JONES and she/he had multiple conversations about the robberies previously discussed, and during such times RAMSEY was present as well. The SOI stated she/he overheard JONES and RAMSEY planning the robberies and details pertaining to

said incidents after they had been committed. The SOI stated that JONES had shown her/him news articles on his cellular device pertaining to the robberies. In addition, the SOI observed large amounts of U.S. currency and tobacco products in JONES' possession. The SOI stated that the back-pack located in JONES' room by Chesterfield County Police were the same items used in several of the above robberies.

CONCLUSION

17. Based on the aforementioned factual information, I respectfully submit there is probable cause to charge ANTONIO LAMONT JONES and DERRICK ORLANDO RAMSEY with one count of Hobbs Act robbery in violation of Title 18 U.S.C. § 1951(a), and one count of Use of a Firearm in a Crime of Violence in violation of Title 18 U.S.C. § 924(c).

Respectfully Submitted,



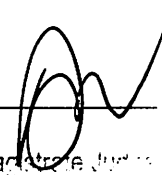
Joshua Hylton

Task Force Officer

Federal Bureau of Investigation

Reviewed and approved: David Schiller, AUSA

SUBSCRIBED and SWORN before me this May 11, 2017.

/s/ 
David J. Novak
United States Magistrate Judge

DAVID J. NOVAK

UNITED STATES MAGISTRATE JUDGE